

U.S. Department of Justice

United States Attorney Eastern District of New York

JMM:SK F. #2013R00948

610 Federal Plaza Central Islip, New York 11722

March 12, 2015

By Email

Richard D. Haley, Esq. One Suffolk Square 1601 Veterans Memorial Highway Suite 425 Islandia, NY 11749

Joseph Conway, Esq. LaRusso & Conway 300 Old Country Road, Suite 341 Mineola, NY 11501

Re: United States v. Philip Kenner & Tommy C. Constantine

Criminal Docket No. 13-607 (S-1) (JFB)

Dear Counsel:

Enclosed please find supplemental material produced pursuant to 18 U.S.C. § 3500 for witnesses who may testify during the government's case-in-chief at the trial in the above-captioned matter. As the government previously noted, the government previously produced documents containing prior statements of witnesses in conjunction with the Rule 16 discovery in this matter. The government will not reproduce material that constitutes § 3500 material that has already been produced to the defendants during discovery. The government renews its request for production of materials pursuant to Federal Rule of Criminal Procedure 26.2 from the defendants.

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/Saritha Komatireddy
Saritha Komatireddy
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cc: Clerk of the Court (JFB) (by ECF)